

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

In Re:	/	Case No. 18-32916
John Symonds, II	/	Judge Mary Ann Whipple
Rebecca Symonds	/	<b>RESPONSE TO MOTION</b>
Debtor(s)	/	<b>FOR RELIEF FROM STAY FILED BY</b>
	/	<b>Americredit Financial Services, Inc., dba</b>
		<b>GM Financial</b>
	/	<b>2013 Kia Soul Wagon 4d</b>

**NOW COME** Debtors, John Symonds, II and Rebecca Symonds, by and through counsel, Randy L Reeves, and hereby respectfully object to the Motion for Relief from Stay filed by Americredit Financial Services, Inc., dba GM Financial in the above captioned matter. Although the Debtors are not current they have made payments since the filing of the Motion and the vehicle is necessary for an effective reorganization. Further, a portion of the claim is being paid as an arrearage claim in the Chapter 13 Plan.

**WHEREFORE**, Debtor respectfully objects to the Motion for Relief from Stay filed in the above captioned matter and requests a hearing on said objection.

Respectfully Submitted,  
REEVES AND SHERRICK CO., L.P.A.

/S/ Randy L .Reeves  
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**PROOF OF SERVICE**

I certify that on March 7, 2019 a true and correct copy of the response to motion for relief from stay was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

Elizabeth Vaughan, Trustee, [13ECFNotices@chapter13toledo.com](mailto:13ECFNotices@chapter13toledo.com)

U.S. Trustee's Office, [ustp.region09@usdoj.gov](mailto:ustp.region09@usdoj.gov)

Molly Slutsky Simons, Attorney for Movant, [bankruptcy@sottileandbarile.com](mailto:bankruptcy@sottileandbarile.com)

And by regular U.S. mail, postage prepaid, on:

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